



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4**

Science and Ecosystem Support Division
Enforcement and Investigations Branch
980 College Station Road
Athens, Georgia 30605-2720

May 18, 2009

4SESD-EIB

MEMORANDUM

SUBJECT: Re-issue of Asbestos Inspection Report
Liberty Fibers Corporation
Lowland, TN
Project Nos. 08-0515/08-0605

FROM: Archie Lee, Chief
Enforcement and Investigations Branch

THRU: Antonio Quinones, Deputy Director
Science and Ecosystem Support Division

TO: Scott Gordon, Chief of Staff
Office of the Regional Administrator

Attached is the final report for the Asbestos Investigation conducted at the Liberty Fibers Industrial Plant in Lowland, Tennessee, on May 28, 29 and July 2, 2008. This report includes revisions from comments we received from Robert Caplan of OEA. Please replace all copies previously sent to you with this revision.

This report has not been distributed outside of EPA. If you have any questions regarding this report, please contact me at (706)355-8584.

Attachment

cc: Kelly Sisario, Chief
Enforcement and Compliance Planning and Analysis Branch

Robert Caplan, Senior Attorney
Office of Environmental Accountability

United States Environmental Protection Agency
Region 4

Science and Ecosystem Support Division
980 College Station Road
Athens, Georgia 30605-2720



Asbestos Investigation Report
Liberty Fibers Corporation
Lowland, Tennessee

Dates of Study: May 28 and May 29, and July 2, 2008

SESD Project Identification Number: 08-0515/08-0605

Requestor: Scott Gordon, Chief of Staff
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Title and Approval Sheet

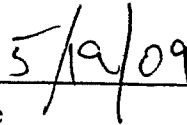
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Lowland, Tennessee

Document Type: Investigation Final Report

Approving Official:



Mike Bowden, Chief
Air and Superfund Section
Enforcement and Investigations Branch

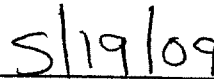


Date

SESD Project Leader:



Greg Noah, Technical Authority
Air and Superfund Section
Enforcement and Investigations Branch



Date

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**Asbestos Investigation
Liberty Fibers Corporation
Lowland, Tennessee
Dates of Study: May 28 and May 29, and July 2, 2008**

INTRODUCTION

Personnel from the United States Environmental Protection Agency (EPA), Region 4, Science and Ecosystem Support Division (SESD), and Air, Pesticides, and Toxics Management Division (APTMD), conducted an investigation at the Liberty Fibers Corporation in Lowland, Tennessee. This investigation was requested by Scott Gordon, Region 4 EPA, Atlanta, Georgia. The investigation included two site visits. The first site visit occurred on May 28 and 29, 2008, and the second site visit occurred on July 2, 2008. Samples were collected during both site visits.

The following personnel comprised the sampling team(s) for the investigation:

May 28 and 29, 2008 Site Investigation

<u>Name</u>	<u>Organization</u>	<u>Responsibility</u>
Gregory Noah	Region 4 EPA, SESD	Team Leader, Sampler
Pam McIlvaine	Region 4 EPA, APTMD	Sampler
Randall Harrison	Tennessee Department of Environmental Control (TDEC)	Sampler

July 2, 2008 Site Investigation

<u>Name</u>	<u>Organization</u>	<u>Responsibility</u>
Gregory Noah	Region 4 EPA, SESD	Team Leader, Sampler
Mark Bean	Region 4 EPA, SESD	Sampler

SUMMARY

The investigation at the Liberty Fibers Corporation facility focused on several objectives. The objectives were to: perform a walk through of the facility to identify suspect asbestos containing material (ACM) on site including disposal in waste piles and from abatement activity and collect samples; investigate the condition and contents of bags of suspect ACM stored on site and collect samples; inspect and sample materials near outfall 004; determine if proper asbestos abatement techniques were used; and investigate several areas of interest where asbestos may have been buried. A total of twenty-six bulk samples of suspect ACM were collected from the Liberty Fibers Corporation facility to determine presence and percentage of asbestos. Eighteen of these samples were collected from building debris piles identified during the walk through, and nine samples tested

positive for asbestos. The sample near outfall 004 tested negative for asbestos. Eight bulk samples were collected from randomly selected bags of abated material, and six of the bags sampled tested positive for asbestos. After opening and sampling, these bags were inspected to determine if wet methods were used in the removal. Only three bags from the abatement activities which were opened showed signs of wet removal. Samples collected near three targeted areas where asbestos was suspected to be buried tested negative for asbestos. The sampling methodology and results are discussed in detail later in this report.

BACKGROUND

Liberty Fibers Corporation

The Lowland, Tennessee Liberty Fibers Corporation facility located at 4901 Enka Hwy, Hwy 160, Lowland, TN manufactured synthetic fibers such as rayon and polyester. The first phase of the facility was constructed in 1947 to produce rayon and was originally named American Enka. In 1956, the rayon staple plant was constructed, and in 1967, the polyester staple plant was constructed. BASF purchased the plant in 1985, and then sold the rayon staple plant to Lenzing Fibers in 1992 and the polyester staple plant to Intercontinental Polymer Incorporated in 1995. Lenzing Fibers later became Liberty Fibers and filed for bankruptcy in 2005. A&E Salvage Inc. has been operating a scrap recycling business at the facility since 2006.

A joint site visit was conducted by EPA Region 4 and the Tennessee Department of Environmental Control (TDEC) on March 20 and 21, 2008, and a number of issues were discovered. This report focuses only on asbestos contamination concerns at the facility. When EPA and TDEC visited the site, demolition and salvage operations were in process by A&E Salvage. Most of the rayon filament plant was demolished and salvage had been on-going. Other buildings, that may or may not have been part of the rayon filament plant, were down or in the process of demolition/salvage including the powerhouse, caprolactam building, salt plant, and rayon staple plant.

Asbestos Removal Activities

Because of the age and size of the facility, it was expected that asbestos containing material would have been present in the buildings. The representatives of the Trustee and A&E Salvage both advised the inspectors that an asbestos survey had been completed at some time, but the survey could not be located. They also indicated that materials containing asbestos had been painted with red (asbestos containing) or green (not asbestos containing) dots. The inspectors observed that there were markings on some pipe lagging. The inspectors also noted material such as suspicious lagging and insulation remaining on pipes in the debris fields that could be ACM.



Figure 3, Asbestos Disposal Bags



Figure 4, Stored Bags of Abated ACM

The bags were in relatively good condition with few having rips or holes. The majority of the bags are labeled, but do not identify any of the removal or facility information (Figure 3). The earliest date seen on labels which were visible was February 2007, but since the vast majority of the labels could not be seen, there may have been some with dates earlier than February 2007. It cannot be determined how old the bags without labels might be. The bags themselves are of differing material. Some are bags made for asbestos removal that are 6 mil thickness with hazard labeling, but most bags were 3 mil general contractor bags or even thinner black yard trash bags. Also, an empty 3 mil contractor clean-up bag box was found in the asbestos storage building (Figure 5).

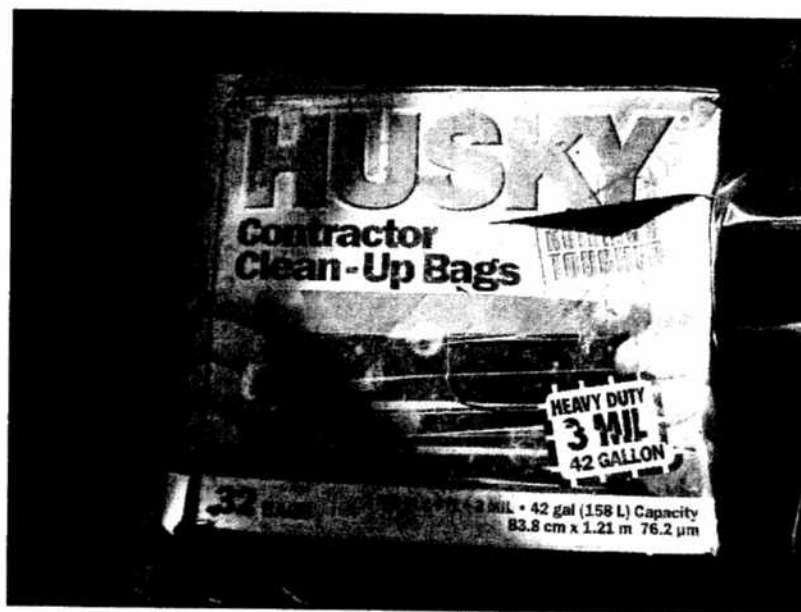


Figure 5, 3 mil Contractor Clean-Up Bags

The inspectors looked in bags that were ripped or punctured to determine if they were moist or dry. All bags that were ripped or punctured appeared to contain dry contents. The inspectors lifted several bags to see if they felt like they had water or mud inside to determine if any wetting had occurred. Several bags felt like semi-solid material was inside, and they were cool to the touch indicating possible water inside. It was inconclusive whether the material inside the bags had been properly wetted and kept wet. No bags were opened during the May investigation, and one sample was taken from a ripped bag (ASB528008). Sampling details are listed in Table 1, Sample Identification and Description and Table 2, Polarized Light Microscopy Sample Analysis Summary.

Debris Near Outfall 004

The area near outfall 004 was an area of concern because of a dispute between A&E and the wastewater treatment plant. The area could be characterized as mixed construction debris including concrete, steel, brick, roofing material, and various other materials. It appeared that this pile could be rubble from the demolition of the salt plant due to its proximity from that site. The inspectors collected one sample (ASB529009) of the roofing material that could be suspect for asbestos. The details are listed in Table 1, Sample Identification and Description and Table 2, Polarized Light Microscopy Sample Analysis Summary.

JULY 2, 2008 FOLLOW-UP SITE INVESTIGATION

The objectives of the July follow-up site investigation were: to evaluate several areas of interest where asbestos may have been buried and/or disposed in waste piles; to open the suspect ACM bags to determine if the material had been wetted and kept wet; and to collect bulk samples. This investigation was not intended to be a comprehensive sampling survey of all areas on site where ACM may have been buried or disposed in waste piles.

Buried Material and Waste Pile Investigation

The first area inspected where ACM was suspected to be buried or disposed in a waste pile was at the north end of the rayon filament plant under the piled debris in the area. The large pile was primarily concrete rubble and brick with scattered steel throughout the area. The inspectors used a shovel to dig a hole through the debris at a low spot in the pile at GPS coordinates N 36° 09.369 W 83° 12.288. The hole was approximately 1 ½ feet deep and reached the concrete slab of the building. Only concrete and brick were discovered during the dig.

The second area inspected where ACM was suspected to be buried or disposed in a waste pile was across the street running next to and south of the caprolactam building. The area was raised and undulating clay earth with sparse grass growth. A number of removed pipes with insulation still intact were found adjacent to the north of the area. Several holes were dug that revealed suspicious material. Packed grey veins of unknown material were located at varying levels below the surface which appeared to be different than that

of the clay earth in the area. Two bulk samples of the material were collected and the details are listed in Table 1, Sample Identification and Description and Table 2, Polarized Light Microscopy Sample Analysis Summary.

The last area that was investigated was in the southern area of the salt plant. This area was large with scattered piles of debris of various types. Reports indicated that ACM may be buried in this area, but the inspectors could not find a suspicious location due to the amount of debris. However, while searching the area, the inspectors found a couple of areas of interest. The first area contained two piles approximately 6' x 3' of what appeared to be removed TSI (Figures 6 & 7). The material was dry and underneath a tall roof that was still intact. Pipes with lagging and TSI were also found scattered throughout the salt plant debris pile. Bulk samples were collected from these materials and the details are listed in Table 1, Sample Identification and Description and Table 2, Polarized Light Microscopy Sample Analysis Summary.



Figure 6, Detail of one pile of removed ACM



Figure 7, Both piles of removed ACM

Suspect ACM Bag Observations

At the building storing the large number of bags containing suspect ACM, eight bags were selected from various rooms with varying dates of removal. Of the eight bags, only three showed any sign of wetting. The other five bags were dry and did not appear to have any sign of water used in the removal. Bulk samples were taken from each bag and the details are listed in Table 1, Sample Identification and Description and Table 2, Polarized Light Microscopy Sample Analysis Summary. While sampling the bags, a small amount of suspicious debris was found in a corner. The material appeared to be a fibrous remnant of abated TSI and was sampled (ASB72003).

INVESTIGATION RESULTS (MAY 28, 29 AND JULY 2, 2008)

The objectives for this investigation were to: perform a walk through of the facility to identify suspect ACM and collect bulk samples; investigate the condition and contents of the bags of suspect ACM stored on site and collect bulk samples; inspect and sample materials near outfall 004; determine if proper asbestos abatement techniques were used; and investigate several areas of interest where ACM may have been buried or disposed in waste piles. This facility covers a very large area, and this investigation was not intended to be a comprehensive sampling survey of all debris piles or buildings on site where ACM may have been buried or disposed in waste piles.

The report tables following provide information about the sampling locations, sample descriptions, and laboratory results.

Table 1, Sample Identification and Description, is a list of all bulk samples collected for this investigation and includes the sample ID number, location, location description, GPS coordinates, and sample description.

Table 2, Polarized Light Microscopy Sample Analysis Summary, is a summary of pertinent details regarding the results of the polarized light microscopy analysis. The table includes sample ID, location, non-asbestiform components, and asbestiform components. If asbestiform components were identified, the type of asbestos and the approximate percentage of the sample that is asbestos is noted. If no asbestos was detected, "Non-Asbestos Containing" is noted. For a material to be considered ACM, the total percentage of asbestos must be 2% or greater. In sample ASB529012, amosite was detected, but the percentage fell below 2%, thus the "Non-Asbestos Containing" designation.

Table 3, Performance Evaluation Sample Comparison, is a summary of the reported performance evaluation sample values and the reported results from the laboratory. Further discussion of the results can be found below in the Quality Control Samples section.

Walk Through and Sampling

The walk through of the facility revealed the facility to be in various stages of abandonment, salvage and demolition. Suspect asbestos containing material was found in many of the debris piles and sampled. Many of the bulk sample results from these waste piles confirmed that they were ACM. The presence of asbestos scattered through many of the waste piles indicates that ACM is comingled with the demolition debris. Furthermore, many pipes still having TSI and lagging which tested positive for asbestos were found in the piles suggesting that a thorough abatement project was not completed or attempted prior to demolition. Bulk samples collected from the debris piles are ASB528001 through ASB528007, ASB529009 through ASB529012, and ASB72010 through ASB72014. Nine of the eighteen bulk samples tested positive for asbestos.

SAMPLING METHODOLOGY/QUALITY CONTROL

Sample Collection

All bulk samples were collected and handled in accordance with the EPA Region 4 *SESD Field Branches Quality System and Technical Procedures*. The following specific procedures were used during sample collection for all direct field measurements and sampling activities:

Measurement Procedures

SESDPROC-110-R2, Global Positioning System

Environmental Sampling Procedures

EPA 560/5-85-030a, October 1985, Asbestos in Buildings: Simplified Sampling Scheme for Friable Surfacing Materials

Sample Analysis

All bulk samples collected for this investigation were analyzed at Batta Laboratories, Inc. using the method, EPA-600/R-93/116 for Asbestos in Bulk Building Materials by polarized light microscopy (PLM), to determine presence or absence of asbestos, asbestos type, and a semi-quantification of percent. All bulk samples were analyzed in accordance with the Batta Laboratories' standard operating procedure in conjunction with EPA-600/R-93/116. Laboratory analysis reports for each sample are provided in the appendix.

Quality Control Samples

Quality control bulk samples for the study included two performance evaluation (PE) samples purchased from an independent vendor. One sample was included with the shipment of samples collected during the May investigation, and one was included in the shipment of samples collected from the July investigation. In analyzing a PE bulk sample using polarized light microscopy, the laboratory analyst qualitatively identifies the type of asbestos and gives a semi-quantitative estimate of percent area of the asbestos fibers on the slide.

In the first shipment in May, a PE sample of 7% amosite by weight, which equates to 9% to 13% by area, was included. The laboratory analyst identified the PE sample as 5% amosite, correctly identifying the asbestos type, but underestimating the percent area. In the second shipment in July, a PE sample of 3% chrysotile by weight, equating to 0% to 7% by area, was included. The laboratory analyst identified the PE sample as 4% chrysotile, correctly identifying the asbestos type, and estimating the percent area within specified limits. The results are illustrated in Table 3, Performance Evaluation Sample Comparison.

In both cases, the analyst correctly identified the samples as containing asbestos and correctly identified the type of asbestos. The analyst underestimated the percent area in one sample, but correctly estimated the area in the other. The PE standard's vendor indicates that results may be biased by thickness and shape variations and also by significant density differences between the asbestos phase and the binder/matrix materials. Correct identification of the presence of asbestos is the essential component for this investigation to determine if asbestos exists in the sampled areas at the facility. The PE results were satisfactory in meeting the objectives for this study.

Table 1
Sample Identification and Description
Asbestos Investigation
Liberty Fibers Corporation
Lowland, Tennessee

Dates of Study: May 28 and May 29, and July 2, 2008

Sample ID	Location	Location Description	GPS Coordinates	Sample Description
ASB528001	Rayon Staple Pile	10 cm3 area of sampled material mixed over 10 ft2 area	N 36° 09.343 W 83° 12.471	Debris pile of Rayon staple building. Decayed pipe lagging with insulation material inside.
ASB528002	Rayon Filament Building	Wide area of roofing material spread over several hundred feet	N 36° 09.321 W 83° 12.269	Debris pile from rayon filament. Crumbled material appeared to be roofing material. Black flat crumbly material with fibers.
ASB528003	Rayon Filament Building	Debris pile from rayon filament building suspect material spread across 10ft2 area	N 36° 09.327 W 83° 12.232	Material interspersed with fibrous material and round balls. Gray material, soft, with fibers in wet matrix.
ASB528004	Powerhouse	Boiler analysis room off to side of powerhouse to the North	N 36° 09.379 W 83° 12.158	Material gray in color, hard, almost cementitious. Mixed material in room.
ASB528005	Powerhouse	Boiler analysis room off to side of powerhouse to the North	N 36° 09.327 W 83° 12.232	Fibrous material scraped from flat material. 6 inch square area.
ASB528006	Rayon Filament Building	Rayon filament debris pile, near standing structure of remnant of original building	N 36° 09.257 W 83° 12.267	Flat black fibrous material, roofing material.
ASB528007	Rayon Filament Building	Rayon building inside, possibly spinning room	N 36° 09.208 W 83° 12.277	Wet, off white, fibrous material on ground.
ASB528008	Asbestos Storage Building	Sampled from opened (previously torn) bags. Bags were asbestos disposal bags from prior removal	N 36° 09.349 W 83° 12.376	Wet and dry, off white and light gray.
ASB529009	West of Outfall 004	Sampled from waste pile between 004 outfall and fence. Approximately in center of pile	N 36° 09.385 W 83° 12.647	Flat black, fibrous, roofing material.
ASB529010	Lye Offload Building	Sampled from waste pile to the east of the lye building off removed pipe and insulation	N36° 09.464 W 83° 12.416	Off white, fibrous, powdery material.

Table 1, Sample Identification and Description (continued)

ASB529011	Rayon Filament Plant	Sampled from weathered debris on ground	N 36° 09.256 W 83° 12.279	Weathered debris.
ASB529012	Rayon Filament Plant	Dirt sample from ground near decaying insulation	N 36° 09.256 W 83° 12.279	Visible fibers in fine powdery dust.
ASB72001	Asbestos Storage Building	South room, sample collected from asbestos removal bag dated 2/17/08	Inside Building no coordinates	Grey mushy material with fibers, damp and clumpy.
ASB72002	Asbestos Storage Building	South room, sample collected from asbestos removal bag dated 3/29/08	Inside Building no coordinates	Dry material, grey and fibrous. Appeared to be removed dry without wetting
ASB72003	Asbestos Storage Building	South room, sample collected from debris on floor to the left of door immediately as you enter	Inside Building no coordinates	Grey, dry, fibrous material. Appears to be debris from ACM bags.
ASB72004	Asbestos Storage Building	North room, sample collected from asbestos removal bag was not dated	Inside Building no coordinates	Off white, fibrous, semi-damp material. Minimal wetting appeared to be used.
ASB72005	Asbestos Storage Building	North room, sample collected from asbestos removal bag	Inside Building no coordinates	White fibrous material, dry, no wetting during removal. Appears to have vermiculite flakes.
ASB72006	Asbestos Storage Building	North room, sample collected from asbestos removal bag with no label	Inside Building no coordinates	Fibrous white material, dry, it appears to have been removed dry.
ASB72007	Asbestos Storage Building	North room, sample collected from asbestos removal bag with no label	Inside Building no coordinates	White fibrous material, dry, little or no wetting in removal suspected.
ASB72008	Asbestos Storage Building	North room, sample collected from asbestos removal bag dated 8/28/07	Inside Building no coordinates	Grey, black, and tan multi-layer TSI, dry, no water.
ASB72009	Asbestos Storage Building	North room, sample collected from asbestos removal bag dated 8/27/07	Inside Building no coordinates	Off white, fibrous, dry material (TSI). Appears that the material was not wetted when removed.
ASB72010	Salt Plant	Pile of removed ACM, under building roof	N 36° 09.317 W 83° 12.481	Off white, fibrous material, dry.

Table 1, Sample Identification and Description (continued)

ASB72011	Salt Plant	Pipe with lagging and insulation remnants	N 36° 09.339 W 83° 12.519	Brownish, fibrous material, dry with powdery matrix
ASB72012	West of Caprolactam Plant	Damaged pipes with lagging and insulation	N 36° 09.283 W 83° 12.213	Off white, fibrous, grey material
ASB72013	Caprolactam Plant	Material dug out of ground near (SW) of Caprolactam Plant debris pile	N 36° 09.277 W 83° 12.220	Packed grey dirt-like material with sparse fibers
ASB72014	Caprolactam Plant	Material dug out of ground near (SW) Caprolactam Plant debris pile	N 36° 09.278 W 83° 12.219	Gray and tan clumpy powder

Table 2
Polarized Light Microscopy Sample Analysis Summary
Asbestos Investigation
Liberty Fibers Corporation
Lowland, Tennessee
Dates of Study: May 28 and May 29, and July 2, 2008

Sample ID	Location	Non-Asbestiform Components	Asbestiform Components
ASB528001	Rayon Staple Pile	95% Non-fibrous	2% Amosite 3% Chrysotile
ASB528002	Rayon Filament Building	30% Cellulose 55% Non-fibrous	15% Chrysotile
ASB528003	Rayon Filament Building	3% Cellulose 2% Fiberglass 95% Non-fibrous	Non-Asbestos Containing
ASB528004	Powerhouse	3% Wollastonite 97% Non-fibrous	Non-Asbestos Containing
ASB528005	Powerhouse	90% Non-fibrous	10% Chrysotile
ASB528006	Rayon Filament Building	90% Non-fibrous	10% Chrysotile
ASB528007	Rayon Filament Building	90% Non-fibrous	10% Amosite
ASB528008	Asbestos Storage Building	3% Synthetic fiber 97% Non-fibrous	Non-Asbestos Containing
ASB529009	West of Outfall 004	15% Cellulose 85% Non-fibrous	Non-Asbestos Containing
ASB529010	Lye Offload Building	3% Carbon fiber 2% Cellulose 95% Non-fibrous	Non-Asbestos Containing
ASB529011	Rayon Filament Plant	85% Non-fibrous	10% Amosite 5% Chrysotile
ASB529012	Rayon Filament Plant	100% Non-fibrous	<1% Amosite Non Asbestos Containing
ASB72001	Asbestos Storage Building	35% Fiberglass 60% Non-fibrous	<1% Amosite 5% Chrysotile
ASB72002	Asbestos Storage Building	93% Non-fibrous	5% Amosite 2% Chrysotile
ASB72003	Asbestos Storage Building	35% Fiberglass 60% Non-fibrous	5% Chrysotile
ASB72004	Asbestos Storage Building	94% Non-fibrous	3% Amosite 3% Chrysotile

Table 2, Polarized Light Microscopy Sample Analysis Summary (continued)			
ASB72005	Asbestos Storage Building	5% Synthetic fiber 95% Non-fibrous	Non Asbestos Containing
ASB72006	Asbestos Storage Building	89% Non-fibrous	8% Amosite 3% Chrysotile
ASB72007	Asbestos Storage Building	5% Cellulose 95% Non-fibrous	Non Asbestos Containing
ASB72008	Asbestos Storage Building	80% Cellulose 15% Non-fibrous	5% Chrysotile
ASB72009	Asbestos Storage Building	93% Non-fibrous	5% Amosite 2% Chrysotile
ASB72010	Salt Plant	90% Non-fibrous	5% Amosite 5% Chrysotile
ASB72011	Pipe with lagging and insulation remnants	10% Cellulose 90% Non-fibrous	Non Asbestos Containing
ASB72012	Damaged pipes with lagging and insulation	92% Non-fibrous	8% Amosite
ASB72013	Material dug out of ground near (SW) of Caprolactam Plant debris pile	100% Non-fibrous	Non Asbestos Containing
ASB72014	Material dug out of ground near (SW) Caprolactam Plant debris pile	100% Non-fibrous	Non Asbestos Containing

END OF REPORT

